

300017804

FILED-USDC-NDTX-DA
25 MAY 14 PM 12:07

LM

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

Jennifer L. Ryan,

Plaintiff,

v.

PAYPAL, INC.,

Defendants.

§
§
§
§
§
§
§
§**3 - 25 CV 1223 - E**

Civil Action No. _____

**COMPLAINT FOR CIVIL RIGHTS VIOLATIONS,
STATE-ACTOR LIABILITY, AND DAMAGES ARISING FROM UNLAWFUL
DEPLATFORMING AND DEFAMATION**

COMES NOW Plaintiff Jennifer L. Ryan, proceeding pro se, and files this Complaint against Defendant PayPal Holdings, Inc. ("PayPal") for unconstitutional financial censorship, viewpoint discrimination, and coordinated suppression of political dissent in violation of federal civil rights laws (42 U.S.C. §§ 1983, 1985) and Texas state law.

1. On January 21, 2021, PayPal terminated Plaintiff's account following her \$200 fundraiser tweet to cover legal fees for January 6-related misdemeanor charges, disclosing the closure to CBS News and other media outlets, flagging and portraying Plaintiff as an "extremist" and "domestic terrorist." These actions, coordinated with federal agencies (FinCEN, DOJ, FBI), triggered mass deplatforming, viral defamation, destruction of Plaintiff's real estate business, and her incarceration, violating her First, Fourth, and Fourteenth Amendment rights and causing severe harm.

2. **Notice of Related Case:** This case is related to *Ryan v. DOJ & Rochlin*, Case No. 3:25-CV-00325-X-BT, involving similar issues of January 6-related government targeting and constitutional violations. Plaintiff alleges as follows:
-

I. INTRODUCTION

3. This civil rights action challenges PayPal's role as a state actor in a coordinated government-private sector campaign to suppress political dissent following January 6, 2021. PayPal terminated Plaintiff's account, froze her funds, and disclosed her account closure to national media, portraying her as an "extremist" under pressure from FinCEN, DOJ, and FBI, pursuant to post-January 6 directives targeting alleged "extremist" transactions.
4. PayPal's actions violated Plaintiff's First, Fourth, and Fourteenth Amendment rights under 42 U.S.C. §§ 1983 and 1985, and Texas state law, causing business destruction, reputational harm, mob attacks, and incarceration. As established in *Bantam Books, Inc. v. Sullivan*, 372 U.S. 58 (1963), such corporate-state collusion transforms a private entity into a state actor liable for constitutional violations.
5. Plaintiff seeks damages, declaratory, and injunctive relief to address PayPal's financial censorship and prevent further erosion of free speech and due process.
-

II. PRELIMINARY STATEMENT

6. Following January 6, 2021, federal agencies, including the DOJ, FBI, FinCEN, and DHS, engaged in coordinated efforts to suppress political dissent, labeling January 6 protesters as “domestic terrorists” and “extremists” without due process, amplified by media and financial institutions.
 7. These efforts misused counterterrorism protocols, including anti-money laundering (AML) controls under the Patriot Act, to target lawful political expression, resulting in censorship, economic exclusion, and reputational harm for individuals like Plaintiff, despite no convictions for violent conduct.
 8. Official actions, including Executive Order 14147 (January 20, 2025) addressing January 6-related government overreach and December 2024 congressional findings on government-private sector collusion, confirm these constitutional violations. (Ex. 1, Executive Order 14147; Ex. 18, Congressional Findings.)
 9. Plaintiff seeks redress for injuries arising from PayPal’s role in this unconstitutional campaign, coordinated with federal agencies.
-

III. PARTIES

10. Plaintiff Jennifer L. Ryan resides in Dallas, Dallas County, Texas. She supported President Trump, used Twitter (now X) to express her views, and was a PayPal user and received a Presidential Pardon on January 20, 2025. (Exhibit 2, Pardon)

11. Defendant PayPal Holdings, Inc. is a Delaware corporation headquartered in San Jose, California, operating a global payment platform and conducting substantial business in Texas.
-

IV. VENUE AND JURISDICTION

12. This Court has subject matter jurisdiction under 28 U.S.C. § 1331 for federal claims under 42 U.S.C. §§ 1983 and 1985, and supplemental jurisdiction over state law claims under 28 U.S.C. § 1367.
13. Personal jurisdiction exists over PayPal, which conducts business in Texas and caused harm in this District through its actions against Plaintiff.
14. Venue is proper in the Northern District of Texas, Dallas Division, under 28 U.S.C. § 1391(b), as Plaintiff resides in Dallas County, PayPal's actions caused harm here, and a related case, *Ryan v. DOJ & Rochlin*, Case No. 3:25-CV-00325-X-BT, is pending in this District. (Ex. 3, DOJ Complaint.)
-

V. PROCEDURAL HISTORY

15. On July 5, 2022, Plaintiff filed *JLR Global, LLC v. PayPal Holdings, Inc.*, Case No. 4:22-CV-559 (E.D. Tex., Sherman Div.), asserting tort claims arising from PayPal's January 21, 2021, account termination and media disclosures leading to mass cancellations. (Ex. 4, *JLR Global* Complaint.)

16. On March 15, 2023, the Sherman court, under Judge Amos Mazzant, stayed the case pending arbitration. (Ex. 5, Memorandum and Order.)
 17. No arbitration occurred due to PayPal's failure to pay American Arbitration Association (AAA) fees, closing Plaintiff's filing (Exhibit 6, AAA Case No. 01-23-0003-6758), selective court rulings, unaddressed motions, and delays. (Ex. 9, Declaration of Jennifer Ryan; Ex. 8, AAA Termination, October 3, 2023.)
 18. PayPal's litigation conduct, including merits-based responses constituted waiver of arbitration, necessitating Plaintiff's dismissal without prejudice on May 1, 2025. (Ex. 7, Voluntary Notice of Dismissal.)
 19. Plaintiff refiles in this Court, asserting new § 1983 and § 1985 claims based on evidence uncovered in late 2024 and early 2025, including Executive Order 14147 and congressional findings, distinct from *JLR Global's* tort claims. (Ex. 1, Ex. 18; Compl. ¶ 34.)
-

VI. ARBITRATION

20. In *JLR Global*, PayPal invoked an arbitration clause, resulting in a stay on March 15, 2023. (Ex. 5.) PayPal waived its right to compel arbitration through conduct inconsistent with arbitration, including:
 - a. Refusal to pay AAA fees, closing Plaintiff's filing (AAA Case No. 01-23-0003-6758, October 3, 2023). (Ex. 8; Statement of Facts ¶ 17.)
 - b. Unreasonable 25-month delay, from March 2023 to present. (Statement of Facts ¶ 17.)

- c. Substantive litigation, engaging Plaintiff's § 1983, § 1985, and tort claims, including a Response applying a trial standard to § 1983 evidence, a Combined Response disputing collusion, and a Motion to Strike labeling claims "frivolous" in violation of its own Arbitration Agreement, (Ex. 8, PayPal Arbitration Agreement from *JLR Global*).
 - d. PayPal's litigation addressed Plaintiff's collusion claims, evidenced by the 44-minute gap between PayPal's termination email and CNET's contact, 18-minute gap to CBS's report, and six-day proximity to the FBI's raid, indicating coordinated action with FinCEN, DOJ, and FBI. (*Adickes v. S.H. Kress & Co.*, 398 U.S. 144, 152 (1970); Statement of Facts ¶¶ 2–9; Ex. 10–17; Ex. 18–30)
21. PayPal's Response applied a trial standard, usurping the arbitrator's role in assessing frivolous claims under the User Agreement, breaching arbitration intent (Ex. 8). (*Henry Schein, Inc. v. Archer & White Sales, Inc.*, 586 U.S. 63, 68 (2019).)
22. PayPal's conduct constitutes waiver under *Morgan v. Sundance, Inc.*, 596 U.S. 411 (2022), and *Vine v. PLS Fin. Servs., Inc.*, 689 F. App'x 800 (5th Cir. 2017), as it intentionally litigated rather than arbitrated.
23. Plaintiff's § 1983 and § 1985 claims, based on new evidence (Ex. 1, Ex. 18 Congressional Report regarding January 6th surveillance, Ex. 30 PayPal Inquiry from Congress) and tied to *Ryan v. DOJ & Rochlin*'s misconduct evidence (Case No. 3:25-CV-00325-X-BT), are non-arbitrable constitutional torts, not contract disputes, requiring federal court adjudication. (*Paladino v. Avnet Comput. Techs., Inc.*, 134 F.3d 1054, 1062 (11th Cir. 1998); *Lugar v. Edmondson Oil Co.*, 457 U.S. 922, 937 (1982).)

VII. STATUTE OF LIMITATIONS

24. Plaintiff's claims are timely under equitable tolling, the discovery rule, and the continuing violation doctrine.
25. Plaintiff's § 1983 and § 1985 claims are subject to Texas's two-year personal injury statute of limitations (*Wallace v. Kato*, 549 U.S. 384, 387 (2007)), and her Texas defamation and IIED claims are subject to a one-year limitations period (*Tex. Civ. Prac. & Rem. Code* § 16.002(a)). PayPal's initial actions occurred on January 21, 2021. (Statement of Facts ¶¶ 4–7.)
26. **Equitable Tolling:** The limitations period was tolled by Plaintiff's filing of *JLR Global* on July 5, 2022, within the two-year period. The Sherman court's stay on March 15, 2023, and PayPal's refusal to pay AAA fees delayed adjudication, justifying tolling under *Holland v. Florida*, 560 U.S. 631, 649 (2010). (Ex. 5, 6; Statement of Facts ¶¶ 16–17.)
27. **Discovery Rule:** Plaintiff's § 1983 and § 1985 claims accrued upon discovery of new evidence in late 2024 and early 2025, including Executive Order 14147 and congressional findings, unavailable during *JLR Global*. (*Frame v. City of Arlington*, 657 F.3d 215, 238 (5th Cir. 2011); Statement of Facts ¶ 19; Ex. 1, Ex. 18 [Congressional Findings].)
28. **Continuing Violation Doctrine:** Plaintiff suffers ongoing reputational and economic harm from PayPal's actions, including business closure and social vilification, extending the limitations period under *Huckabay v. Moore*, 142 F.3d 233, 238 (5th Cir. 1998). (Statement of Facts ¶¶ 8, 20; Ex. 13-17, 21, 23.)

VIII. STATEMENT OF FACTS

29. In January 2021, Plaintiff Jennifer L. Ryan, a Dallas resident and Trump supporter, was targeted with financial and reputational harm following her misdemeanor charges related to January 6, 2021. The following timeline details the events leading to her injuries.

A. Timeline of Deplatforming

30. On January 15, 2021, the FBI raided Plaintiff's home in Dallas, Texas, on misdemeanor charges related to January 6, 2021, pre-notifying media outlets who filmed the raid, resulting in global publicity. (Exhibit 10, media footage and reports.)

31. On January 21, 2021, at 8:28 AM, Plaintiff tweeted a lawful \$200 fundraiser to cover legal fees for her misdemeanor charges. (Exhibit 11, tweet screenshot.)

32. On January 21, 2021, at 6:45 PM, PayPal emailed Plaintiff, notifying her of account termination for an alleged violation of its Acceptable Use Policy, without specifying the violation. (Exhibit 12, PayPal email.)

33. On January 21, 2021, at 7:31 PM, CNET contacted Plaintiff, 44 minutes after PayPal's email, citing PayPal's disclosure of her account closure. (Exhibit 13, CNET communication.)

34. On January 21, 2021, at 7:49 PM, CBS News published a report, 18 minutes after CNET's contact, quoting PayPal representative Kim Eichorn and describing Plaintiff's account closure with the phrase "extremist threat high," producing articles and television programming that spread globally. (Exhibit 14, CBS article and broadcast.)

35. Between January 21 and 22, 2021, PayPal's disclosure of Plaintiff's account closure led to over 28 articles by major media outlets (e.g., CNET, CBS News, NBC, The Washington Post), amplified by public commentary and President Biden's statements

about January 6 protesters, portraying Plaintiff as an “extremist” and “domestic terrorist.” (Exhibit 21, Biden statements on (January 8, 2021), Exhibits 15–16, media articles and commentary.)

36. On January 22, 2021, Plaintiff was rapidly deplatformed from social media platforms (e.g., Facebook, Instagram, Zillow) and financial platforms (e.g., Chase Bank, Venmo, Authorize.net), causing financial harm, destruction of her real estate business, eviction from her office, mob attacks, emotional distress, and forcing her to sell her home and relocate under a new name. (Exhibit 17, deplatforming records.)
37. The close temporal proximity—FBI raid on January 15, PayPal’s termination and media disclosures within hours of Plaintiff’s tweet on January 21, and deplatforming on January 22—indicates coordinated action, as recognized in *Adickes v. S.H. Kress & Co.*, 398 U.S. 144, 152 (1970). (Exhibits 10–17.)

B. Government and PayPal Actions

38. In 2021, federal agencies, including the DOJ, FBI, FinCEN, and DHS, labeled January 6 protesters, including Plaintiff, as “domestic terrorists” and “extremists” in official documents and public statements, without due process. (Ex. 19, ODNI Report on Domestic Violent Extremism; Ex. 21, Biden statement, Ex. 22, NSC Strategic Implementation Plan (SIP) and White House Fact Sheet, Ex. 28, PayPal AML Statement).
39. The FBI’s raid on Plaintiff’s home on January 15, 2021, was accompanied by press releases framing January 6 protesters as terrorists. (Ex. 14, “Extremist Threat High”; Ex. 20, FBI-DHS Strategic Intelligence Assessment.)

40. FinCEN issued guidance on January 18, 2021, directing financial institutions to flag January 6-related accounts as high-risk under anti-money laundering (AML) and counter-terrorism protocols, including Adverse Media Alerts. (Ex. 23, FinCEN FAQs on SARs, Ex. 27, Adverse Media (January 21, 2021), Ex. 29, FinCEN notice on information sharing).
41. PayPal, through its 4,000 regulatory staff and integration with public-private databases like CLEAR, collaborated with FinCEN and FBI to monitor and flag accounts, including Plaintiff's, based on her January 6-related activity. (Ex. 24, PayPal 2020 Annual Report; Ex. 25, CLEAR AI Database Ads; Ex. 26, FBI Partnership with CLEAR.)
42. PayPal participated in Zoom calls with FinCEN and FBI, targeting January 6 protesters' fundraising, including Plaintiff's \$200 fundraiser and was instructed to flag crowdfunding for Trump Events. (Ex. 18, Zoom call records, crowdfunding flagging.)
43. Following PayPal's disclosure on January 21, 2021, Plaintiff received rapid account closure notices from multiple financial institutions (e.g., Chase Bank, Authorize.net, Venmo), citing her account activity. (Exhibit 17, Plaintiff's Deplatform List.)

C. Litigation and New Evidence

44. On July 5, 2022, Plaintiff filed *JLR Global, LLC v. PayPal Holdings, Inc.* (Case No. 4:22-CV-559, E.D. Tex.), asserting tort claims arising from PayPal's January 21, 2021, actions. (Ex. 4, *JLR Global* Complaint.)
45. On March 15, 2023, the Sherman court stayed the case pending arbitration, which PayPal obstructed by refusing to pay AAA fees, closing Plaintiff's filing (AAA Case No. 01-23-0003-6758). (Ex. 8, AAA Termination; Compl. ¶¶ 29, 31.)

46. Between February 26 and April 4, 2025, PayPal filed responses in *JLR Global*, addressing Plaintiff's claims, including a Response on February 26, 2025, a Combined Response on April 4, 2025, and a Motion to Strike on April 4, 2025. (Compl. ¶ 32.)
47. New evidence uncovered in late 2024 and early 2025, including Executive Order 14147 (January 20, 2025) addressing January 6th-related government overreach and December 2024 congressional findings on government-private sector collusion, supports PayPal's coordination with FinCEN, DOJ, and FBI, linked to *Ryan v. DOJ & Rochlin* (Case No. 3:25-CV-00325-X-BT). (Ex. 1, Executive Order 14147; Ex. 18, Congressional Report.)
48. PayPal's actions caused Plaintiff's business closure, reputational harm, incarceration, and severe emotional distress, amplified by media coverage (CNN, FOX, NBC, etc.), requiring court adjudication. (Ex. 15, media compilation; Compl. ¶¶ 10–14.)
-

IX. CAUSES OF ACTION

Count 1: 42 U.S.C. § 1983 – First Amendment Violation

49. PayPal, acting under color of law, violated Plaintiff's First Amendment right to free speech by terminating her account on January 21, 2021, based on her lawful \$200 fundraiser tweet. (Statement of Facts ¶¶ 3–4; Ex. 11–12.)
50. PayPal's state actor status is established through:
- a. **Joint Action**, as the 44-minute gap between PayPal's email and CNET's contact, 18-minute gap to CBS's report, and six-day proximity to the FBI's raid indicate a conspiracy with FinCEN, DOJ, and FBI (*Adickes v. S.H. Kress & Co.*, 398 U.S. 144, 152 (1970));

- b. **Nexus**, as PayPal's ban was tied to FinCEN's January 18, 2021, guidance and FBI directives (*Jackson v. Metropolitan Edison Co.*, 419 U.S. 345, 351 (1974)); and
- c. **Compulsion**, as FinCEN's Adverse Media Alerts coerced PayPal's actions (*Blum v. Yaretsky*, 457 U.S. 991, 1004 (1982)). (Statement of Facts ¶¶ 2–9, 10–15, 19; Ex. 1, 4–5, 10–17, 19–30.)

51. This violation, linked to *Ryan v. DOJ & Rochlin*'s evidence of government misconduct (Case No. 3:25-CV-00325-X-BT), caused business closure, reputational harm, mob attacks, and incarceration, and is a non-arbitrable constitutional tort due to public policy concerns. (*Lugar v. Edmondson Oil Co.*, 457 U.S. 922, 937 (1982); *Paladino v. Avnet Comput. Techs., Inc.*, 134 F.3d 1054, 1062 (11th Cir. 1998).

Count 2: 42 U.S.C. § 1983 – Fourth Amendment Violation

52. PayPal, acting under color of law, unreasonably seized Plaintiff's funds by freezing her account without due process on January 21, 2021, violating her Fourth Amendment rights. (Statement of Facts ¶¶ 4, 8; Ex. 12, 17.)
53. PayPal's state actor status is established through Joint Action, Nexus, and Compulsion, as described in Count 1. (*Adickes v. S.H. Kress & Co.*, 398 U.S. 144, 152 (1970); *Jackson v. Metropolitan Edison Co.*, 419 U.S. 345, 351 (1974); *Blum v. Yaretsky*, 457 U.S. 991, 1004 (1982); Statement of Facts ¶¶ 2–9, 10–15, 19; Ex. 1, 4–5, 10–17, 19, 37, 42, 50.)
54. This non-arbitrable constitutional tort caused financial harm, linked to *Ryan v. DOJ*. (*Lugar v. Edmondson Oil Co.*, 457 U.S. 922, 937 (1982); *Paladino v. Avnet Comput. Techs., Inc.*, 134 F.3d 1054, 1062 (11th Cir. 1998).)

Count 3: 42 U.S.C. § 1983 – Fourteenth Amendment Violation (Due Process)

55. PayPal, acting under color of law, deprived Plaintiff of her property and liberty without due process by freezing her account and leaking defamatory information to the media on January 21, 2021, leading to deplatforming and incarceration. (Statement of Facts ¶¶ 4–8; Ex. 12–17.)
56. PayPal’s state actor status is established through Joint Action, Nexus, and Compulsion, as described in Count 1. (*Adickes v. S.H. Kress & Co.*, 398 U.S. 144, 152 (1970); *Jackson v. Metropolitan Edison Co.*, 419 U.S. 345, 351 (1974); *Blum v. Yaretsky*, 457 U.S. 991, 1004 (1982); Statement of Facts ¶¶ 2–9, 10–15, 19; Ex. 1, 4–5, 10–17, 19–30.)
57. This non-arbitrable constitutional tort caused severe harm, linked to *Ryan v. DOJ*. (*Lugar v. Edmondson Oil Co.*, 457 U.S. 922, 937 (1982); *Paladino v. Avnet Comput. Techs., Inc.*, 134 F.3d 1054, 1062 (11th Cir. 1998).)

Count 4: 42 U.S.C. § 1985 – Conspiracy to Interfere with Civil Rights

58. PayPal conspired with FinCEN, DOJ, FBI, and media outlets (e.g., CNET, CBS News) to interfere with Plaintiff’s First Amendment rights by coordinating her account termination, media leaks, and deplatforming between January 15 and January 22, 2021. (Statement of Facts ¶¶ 2–9; Ex. 10–17.)
59. The rapid sequence—FBI raid, PayPal’s ban within six days, CNET’s contact 44 minutes after PayPal’s email—establishes a conspiracy. (*Gordon v. Warren Cty. Bd. of Supervisors*, 231 F.3d 1009, 1017 (5th Cir. 2000); *Adickes v. S.H. Kress & Co.*, 398 U.S. 144, 152 (1970); Statement of Facts ¶¶ 2–9; Ex. 10–17.)
60. This non-arbitrable conspiracy, tied to the *Ryan v. DOJ*’s case, caused severe harm. (*Paladino v. Avnet Comput. Techs., Inc.*, 134 F.3d 1054, 1062 (11th Cir. 1998).)

Count 5: Defamation (Texas Law)

61. PayPal falsely implied Plaintiff was an “extremist” and “domestic terrorist” through leaks to CNET and CBS News on January 21, 2021, with reckless disregard for truth, causing over 28 defamatory articles, reputational harm, and business closure. (Statement of Facts ¶¶ 5–8; Ex. 13–17.)
62. The 44-minute and 18-minute gaps indicate pre-arranged intent to defame. (*Doe v. Columbia Univ.*, 831 F.3d 46, 57 (2d Cir. 2016); Statement of Facts ¶¶ 5–6; Ex. 13–14.)
63. This non-arbitrable tort, linked to government collusion, meets Texas defamation elements (false statement, publication, damages). (*WFAA-TV, Inc. v. McLemore*, 978 S.W.2d 568 (Tex. 1998); *Bentley v. Bunton*, 94 S.W.3d 561 (Tex. 2002).)

Count 6: Intentional Infliction of Emotional Distress (Texas Law)

64. PayPal’s extreme and outrageous conduct—false extremist labels, media leaks, and deplatforming—caused severe emotional distress, forcing Plaintiff to sell her home and relocate under a new name. (Statement of Facts ¶¶ 5–8; Ex. 13–17, 21.)
65. The coordinated timing indicates intentional harm. (*Adickes v. S.H. Kress & Co.*, 398 U.S. 144, 152 (1970); Statement of Facts ¶¶ 2–9; Ex. 10–17.)
66. This non-arbitrable tort meets Texas IIED elements (extreme conduct, intentional or reckless, severe distress). (*Twyman v. Twyman*, 855 S.W.2d 619 (Tex. 1993).)

X. PRAYER FOR RELIEF

Plaintiff respectfully requests that this Court:

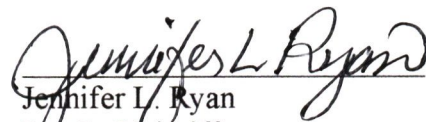
- Award compensatory damages for financial harm, reputational damage, emotional distress, and loss of liberty, in an amount to be determined at trial, but not less than \$25,000,000.
- Award punitive damages to deter PayPal's unconstitutional conduct, in an amount to be determined at trial.
- Declare that PayPal's actions violated Plaintiff's First, Fourth, and Fourteenth Amendment rights under 42 U.S.C. § 1983 and constituted a conspiracy under 42 U.S.C. § 1985.
- Issue an injunction ordering PayPal to reinstate Plaintiff's account and cease financial censorship based on political expression.
- Award costs, attorney's fees (if applicable), and any other relief the Court deems just and proper.

XI. JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

Date: May 14, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jennifer L. Ryan". The signature is written in a cursive style with a horizontal line underneath it.

Jennifer L. Ryan

Pro Se Plaintiff

407 E. Tyler Street

Richardson, TX 75081

469-491-0587

jennaryanrealty@gmail.com

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

DEFENDANTS

(b) County of Residence of First Listed Plaintiff Dallas
 (EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Pay Pal, Inc.
 (IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address, and Telephone Number)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- PLAINTIFF DEF
☒ 1 Citizen of This State ☐ 1 Incorporated or Principal Place of Business In This State
☐ 2 Citizen of Another State ☐ 2 Incorporated and Principal Place of Business In Another State
☐ 3 Citizen or Subject of a Foreign Country ☐ 3 Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability LABOR <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 424 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 425 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 425 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite constitutional statutes unless diversity):

42 USC 1983, 1985
violation of 1st, 4th + 14th amendment rights

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.
 DEMAND \$
 CHECK YES only if demanded in complaint:
 JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

Judge Brantley Starr

DOCKET NUMBER

3:25-cv-00355-

DATE

5/14/2025

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____